

Laura Vartain Horn (SBN: 258485)
KIRKLAND & ELLIS LLP
555 California Street, 30th Floor
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4723
jessica.davidson@kirkland.com

Kim Bueno (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
401 W. 4th Street, Austin, TX 78701
Telephone: (512) 355-4390
kim.bueno@kirkland.com

Counsel for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION,

This Document Relates to:

ALL MATTERS

Case No. 3:23-md-03084-CRB (LJC)

**DEFENDANTS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

Judge: Hon. Lisa J. Cisneros
Courtroom: G - 15th Floor

DEFENDANTS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S
MATERIALS SHOULD BE SEALED
CASE NO. 3:23-MD-03084-CRB (LJC)

TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:

Under Civil Local Rules 7-11 and 79-5(f), Defendants hereby move the Court to consider whether another party's material should be filed under seal in connection with their Joint Letter re Deficient Production of Plaintiffs' Expert Materials.

Material To Be Filed Under Seal

The following materials contain information and documents designated by Plaintiffs as confidential.

Document	Description	Designating Party
Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials	Joint Discovery Letter	Plaintiffs
Ex. 1 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials	Notice of the Deposition of Dr. Mindy Mechanic	Plaintiffs
Ex. 2 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials	November 11, 2025 Deposition of Dr. Mindy Mechanic (excerpted).	Plaintiffs
Ex. 3 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials	November 22, 2025 Deposition of Dr. Mindy Mechanic (excerpted)	Plaintiffs
Ex. 4 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials	Expert Report of Dr. Mindy Mechanic re Plaintiff J.D.	Plaintiffs
Ex. 5 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials	November 23, 2025 Deposition of Dr. Mindy Mechanic (excerpted)	Plaintiffs

DATED: January 2, 2026

Respectfully submitted,

/s/ Laura Vartain Horn

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street, Suite 2700
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com

Kim Bueno (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
401 W. 4th Street, Austin, TX 78701
Telephone: (512) 355-4390
kim.bueno@kirkland.com

Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, And RASIER-CA, LLC